



AUG 10 1990

Reply to
Attn of: HW-112

Bryant L. Adams, Ph.D.
Environmental Engineer
Pacific Wood Treating Corporation
111 West Division Street
P.O. Box 518
Ridgefield, Washington 98642

Re: EPA ID No. WAD 00903 6906

Dear Dr. Adams:

This is in response to your letter of July 24, 1990 and our telephone conversation on August 7, 1990.

In your letter you requested that I review analytic data which you provided regarding leachate samples obtained from PWT's Ridgefield Brick and Tile land disposal site. You asked that EPA remove the leachate, which is a listed hazardous waste, from RCRA regulation based on health-based criteria. As I explained in our conversation, such an action could only be done within the context of a delisting procedure, as provided for at 40 CFR § 260.22. A petition for delisting a hazardous waste must be made to EPA Headquarters in Washington, D.C., as you are aware. Therefore, I am returning the documentation which you submitted, since the regional office cannot act on it.

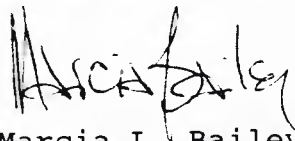
If PWT were to clean close the land disposal unit, the leachate would no longer be regulated as a hazardous waste under Subtitle C of RCRA. EPA Headquarters and Region 10 agree that clean closure of the RBT site may be possible through a removal action and/or through a detailed, written demonstration that the waste residues, containment system components, subsoils, and structure and equipment are not contaminated above health-based criteria and do not exhibit any of the characteristics of hazardous waste. This would have to be demonstrated for all hazardous constituents (as defined in Appendix VIII of 40 CFR Part 261) that could reasonably be construed to have been disposed in the landfill. Criteria to be used for determining health-based levels are found in the proposed 40 CFR Part 264 Subpart S rules, published in the Federal Register on July 27, 1990; and in the Integrated Risk Information System (IRIS), utilizing whichever provides the more conservative value for each constituent. A closure plan

which contemplates clean closure must incorporate all of the above elements, and must specify and describe in detail specific sampling, analysis and quality assurance activities that are to be conducted. Enclosed are two EPA policy guidances and directives which further explicate the requirements of clean closure, including matters relating to ground water monitoring. The Washington Department of Ecology would also have to concur on the appropriateness of a clean closure determination at the RBT site.

If PWT intends to attempt clean closure of the RBT site, a post-closure plan does not have to be submitted with the closure plan. If during the course of closure activities (such as sampling and analysis), PWT should determine that clean closure were not feasible, a post-closure plan (and another revised closure plan) would be required, in accordance with 40 CFR §§ 265.112 and 265.118.

Whether PWT decides to pursue clean closure or closure as a landfill at the RBT site, the submittal of a revised closure plan that is in compliance with the requirements of 40 CFR Part 265 Subpart G remains seriously overdue. Please keep in mind that EPA must provide for public notice and comment for at least 30 days before the closure plan can be approved.

Sincerely,

A handwritten signature in black ink, appearing to read "Marcia L. Bailey". The signature is stylized with a large, looped "M" and a cursive "Bailey".

Marcia L. Bailey
Environmental Scientist
RCRA Compliance Section

Enclosures

cc: Kay Siler, Washington Department of Ecology (w/enclosures)
Jack Boller, Washington Operations Office (w/enclosures)